

Molly Joseph Ward Secretary of Natural Resources

Department of Historic Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Julie V. Langan *Director*

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September 1, 2017

Kim Chen, Principal Planner City of Richmond Planning and Zoning Department City Hall, Room 510, 900 E Broad St Richmond, VA 23219-1907

Re: 3801 North Glenwood Avenue – demolition

Richmond, VA

DHR File No. 2017-3887

Dear Mrs. Chen,

The Virginia Department of Historic Resources (DHR) received information regarding the above referenced project for our review and comment pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. U.S. Department of Housing and Urban Development (HUD) funds will be utilized. DHR understands the undertaking to be the demolition of the building currently located on the property, formerly known as the Richmond Henrico Railway Company Car Barn (DHR ID #127-6270), and the construction of two (2) new apartment buildings and related infrastructure.

As you know, the Richmond and Henrico Railway Company Car Barn (DHR ID #127-6270) has previously been evaluated and determined eligible for listing in the National Register of Historic Places (NRHP). As part of Section 106 consultation for this undertaking, DHR was provided with a Phase IA Cultural Resource Assessment. We concur with that the resource retains sufficient integrity and remains eligible for listing in the NRHP. In addition, DHR concurs that no further archaeological study needed.

The City has determined that the Area of Potential Effects (APE) is limited to the property boundaries. The undertaking is directly adjacent to the NRHP-listed Oakwood Chimborazo Historic District (DHR ID #127-0821) and its indirect effects, including those that are reasonably foreseeable and cumulative, should be taken into account. Given the scale and intensity of this new development, it is our opinion that the APE should include the Oakwood-Chimborazo Historic District. Based on the information provided, we concur that visual effects to the district are limited due to the slope of the site and the project would not diminish those qualities and characteristics that make the district eligible for NRHP-listing.

"An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location design, setting, materials, workmanship, feeling, or

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association" (36 CFR Part 800.5). Demolition, by definition, is considered an adverse effect. Accordingly, DHR recommends a finding of <u>adverse effect</u> for the proposed demolition of 3801 North Glenwood Avenue and development of a Memorandum of Agreement (MOA) to resolve the adverse effect. The City should notify the Advisory Council for Historic Preservation (ACHP) of this finding, provide the necessary documentation as required by 36 CFR Part 800.11(e), and invite their participation in its resolution. The ACHP can be contacted electronically through their Electronic Section 106 Documentation Submittal System (instructions available at http://www.achp.gov/docs/e106-instructions-form.pdf). Other consulting parties, such as Historic Richmond Foundation, should also be notified and invited to participate in the MOA. The public should be afforded an opportunity to comment on this undertaking and effect finding.

Should you have questions or need assistance, contact Laura Lavernia, Architectural Historian in DHR's Review and Compliance Division, via email at Laura.Lavernia@dhr.virginia.gov or by phone at 804-325-8473.

Sincerely,

Roger W. Kirchen, Director Review and Compliance Division